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Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #2: Unreclaimed Sites UR-24, UR-26, and UR-40

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August 18, 2021

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RE: Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #2: Unreclaimed Sites UR-24, UR-26, and UR-40

Agency Representatives:

I am writing to you on behalf of Atlantic Richfield Company to submit **the Butte Priority Soils Operable Unit (BPSOU) Unreclaimed Sites Final Field Sampling Plan (FSP) #2** for review and approval. The plan has been revised to reflect specific Agency comments on the Unreclaimed Sites Draft Final FSP #2. Agency comments and Atlantic Richfield Company responses are provided below, and the final FSP is included in the email with this letter.

Response to specific comments:

Site: UR-26 Grove Creek from Hanson to Rowe Rd

1. *For previous sampling efforts it is stated that six previous samples have been collected and results are provided in Table 1. However, Table 1 only shows two sample results. Please correct text as appropriate, include additional sample results as necessary.*

Atlantic Richfield Response: The text has been revised to reflect the sample results provided in Table 1.

2. *Please clarify that samples will be collected from waste/dredge piles on the site parallel to Grove Gulch. If samples of waste/dredge piles along Grove Gulch are not intended to be collected, please consider them to be an important part of the sampling strategy and characterization effort.*

Atlantic Richfield Response: Comment noted. Atlantic Richfield will make every reasonable effort to appropriately characterize the site to guide decisions related to future remedial



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action as applicable. Additional samples may be requested in the field by the Agency oversight representative, or the field sampling team based on specific site features or evidence of historic mining-related material to fully characterize the site. These samples will be recorded as opportunistic samples.

3. *On Figure 2 for UR-26, samples SO-GG-E and SO-GG-F are misidentified as "SO-66-E" and "SO-66-F". Please correct the figure.*

Atlantic Richfield Response: Figure 2 has been corrected to reflect sample stations SO-GG-E and SO-GG-F.

Site: UR-40 East Clark Mill Tailings

1. *For previous sampling efforts it is stated that three previous samples have been collected and results are provided in Table 2. However, Table 2 shows five sample results. Please correct table 2 and remove "Clark8-uv" samples as they are described and provided in Table 3.*

Atlantic Richfield Response: The text has been updated to reflect sampling results provided in Tables 2 and 3. Table 2 has been revised to include results from three previous samples.

2. *Within the boundary of UR-40 there are multiple areas with varying degrees of vegetation density/success. Additional samples are necessary to fully characterize site conditions. Please collect additional samples, for example, within the southern boundary of the site within erosion/unvegetated areas upgradient of 2007 Remediation Area (i.e., to the east of Clark8-UV and Clark8-V sample locations).*

Atlantic Richfield Response: Additional samples will be collected in the requested area as indicated by sample station UR40-SS-10 and UR40-SS-11. Additional samples may also be requested in the field by the Agency oversight representative or the field sampling team and recorded as opportunistic samples to fully characterize the site.

End of Comments

If you have any questions or comments, please call me at (907) 355-3914.

Sincerely,



Mike Mc Anulty

Liability Manager

Remediation Management Services Company

An affiliate of **Atlantic Richfield Company**

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